

ATTORNEYS AT LAW

Proctors in Admiralty

91 W. CHERRY STREET HICKSVILLE, NEW YORK 11801

(516) 931-0064 TELEFAX (516) 931-4313 USDC SDNY

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HAROLD M. KINGSLEY
JOAN S. KINGSLEY
STEVEN P. CALKINS
KEVIN T. MURTAGH

January 22, 2008

Hon. Theodore H. Katz United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312 Via fax (212) 805-7932

RE: MAN Ferrostaal, Inc. v. M/V DELZOURKE, et al.

07 CIV 7303 (HB)(THK)
Our Ref: FS 7915

Hon. Sir:

We represent the plaintiff in the above captioned matter, refer to our previous status report letter dated January 15, 2008, and respectfully request that the current discovery deadline of February 1, 2008, be extended an additional 45 days to March 17, 2008.

We last reported that settlement negotiations were nearly complete, but there still has been no confirmation to plaintiff from defendants' attorneys that a firm settlement offer exists. Unfortunately, defendants' attorney presenting the settlement offer is away on vacation this week, and we have been unable to obtain the current status of the offer so that we can report same to our clients, or indeed, to obtain consent of defendants' attorneys to this extension request..

Discovery disputes remain outstanding over defendant SK Shipping's responses to plaintiff's discovery, and co-defendants Meadway and Grand Team have failed to formally respond to plaintiff's discovery demands, to date. We do not intend to present these disputes to the Court for resolution while settlement appears at hand, but plaintiff reserves its right to raise these disputes if the matter does not settle in the very near future.

The previous deadline to complete discovery by February 1, 2008, was not met because the parties' attorneys agreed to attempt settlement before engaging in further discovery, including resolving the discovery disputes.

Defendants' attorneys' tentative and conditional offer to settle this case was first made on December 27, 2007, and plaintiff has been waiting ever since for a firm offer to report to the plaintiff.

Accordingly, we respectfully request an extension to March 17, 2008, to complete discovery or resolve this case by settlement.

Respectfully

Thank you.

SPC/

Tisdale Law Offices, LLC cc;

Via fax(203) 254-1641

Attorneys for Defendants Meadway and Grand Team

11 W 42nd Street, Ste. 900

New York, NY 10036

(212) 354-0025

Cichanowicz Callan Keane Vengrow & Textor/

Via fax (212) 344-7285

Attorneys for Defendant SK Shipping

61 Broadway, Ste. 3000 New York, NY 10006-2802

(212) 344-7042.

Deorchis, Weiner & Partners, Esqs,

Via fax (212) 422-5299

Attorneys for third party defendant STX Pan Ocean

61 Broadway, 26th Fl.

New York, NY 10006-2802

(212) 344-4700.

Grated. By February 1, 2008, The parties
still advise the Court as to the status
of set Herest discussions.

SO ORDERED
THEOREM H. M.

UNITED STATES MAGISTRATE JUIT